

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,  
Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO ELECTRIC POWER AUTHORITY,  
Debtor.

PROMESA  
Title III

No. 17 BK 4780-LTS

**Court Filing Relates Only to  
PREPA and Shall Only Be  
Filed in Case No. 17 BK 4780-  
LTS and Main Docket 17 BK  
3283-LTS**

**MOTION TO INFORM REGARDING TERMINATION OF THE RSA**

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States District Court Judge Laura Taylor Swain:

The Ad Hoc Group of PREPA Bondholders (the “Ad Hoc Group of Bondholders”) respectfully submits this motion to inform the Court that AAFAF<sup>2</sup> sent the notice of termination of the RSA attached hereto as Exhibit A. The Ad Hoc Group is not commenting on the validity of AAFAF’s termination or its ramifications, but merely notes that this termination underscores the need for a mediator to be appointed promptly.

WHEREFORE, the Ad Hoc Group of Bondholders respectfully requests that the Court enter an order granting the relief requested in the Mediation & Plan Deadline Motion, and grant such other relief as the Court deems just and proper.

Dated: San Juan, Puerto Rico  
March 8, 2022

Respectfully Submitted,

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<sup>2</sup> Capitalized terms used herein, but not defined shall have the meaning given to them in the *Urgent Motion of the Ad Hoc Group of PREPA Bondholders Pursuant to Section 312 of PROMESA and Section 105 of the Bankruptcy Code to Appoint a Mediator and Impose Deadlines for a PREPA Plan of Adjustment* [ECF No. 2718] (the “Mediation & Plan Deadline Motion”).

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**WE HEREBY CERTIFY** that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record, and will provide hard copies to the Court and United States Trustee as soon as practical after the filing of the foregoing, consistent with the Court's *Order Further Amending Case Management Procedures*. See ECF No. 17127, Case No. 17 BK 3283-LTS